

**SECRET**

**IN THE UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF MISSOURI  
SOUTHERN DIVISION**

**UNITED STATES OF AMERICA,**

Plaintiff,

v.

**(01) ALEEYAH R. FOLSOM,  
[DOB: 4-13-2001]**

and

**(02) DAKOTA RAY MITCHELL,  
[DOB 7-15-2004]**

Defendants.

**No. 24-03106-01/02-CR-S-MDH**

**COUNTS 1, 2, and 3**

18 U.S.C. § 933(a)(1)  
18 U.S.C. § 933(a)(2)  
18 U.S.C. § 933(a)(3)  
18 U.S.C. § 933(b)  
NMT 15 Years Imprisonment  
NMT \$250,000 Fine  
NMT 3 Years Supervised Release  
Class C Felony

**COUNTS 4, 5, 6, and 7**

18 U.S.C. §§ 922(a)(6) and 924(a)(2)  
NMT 10 Years Imprisonment  
NMT \$250,000 Fine  
NMT 3 Years Supervised Release  
Class C Felony

**COUNT 8**

18 U.S.C. §§ 922(g)(3) and 924(a)(8)  
NMT 15 Years Imprisonment  
NMT \$250,000 Fine  
NMT 3 Years Supervised Release  
Class C Felony

\$100 Special Assessment (Each Count of  
Conviction)

## INDICTMENT

THE GRAND JURY CHARGES THAT:

### COUNT 1

Beginning on an unknown date, but as early as April 28, 2023, and continuing through February 1, 2024, said dates being approximate, in Greene County, in the Western District of Missouri, and elsewhere, the defendants, **ALEEYAH R. FOLSOM** and **DAKOTA RAY MITCHELL**, did knowingly conspire and agree with each other and persons known and unknown to the grand jurors to ship, transport, transfer, cause to be transported, or otherwise dispose of one or more firearms, including, but not limited to the following:

1. A Glock, model 21 Gen5, pistol, bearing serial number CATV555;
2. A Glock, model 43X, pistol, bearing serial number AHYG456;
3. A Century Arms, Micro Draco, pistol, bearing serial number 23PMD-43172; and
4. A Glock, model 23, pistol, bearing serial number FNN495;

to another person, in and affecting interstate and foreign commerce, knowing or having reasonable cause to believe that the use, carrying, and possession of a firearm by the recipient would constitute a felony (as defined in section 932(a)), all in violation of Title 18, United States Code, Sections 933(a)(3) and (b).

### COUNT 2

Beginning on an unknown date, but as early as April 28, 2023, and continuing through February 1, 2024, said dates being approximate, in Greene County, in the Western District of Missouri, and elsewhere, the defendant, **ALEEYAH R. FOLSOM**, did ship, transport, transfer, cause to be transported, or other dispose of one or more firearms, including, but not limited to the following:

1. A Glock, model 21 Gen5, pistol, bearing serial number CATV555;
2. A Glock, model 43X, pistol, bearing serial number AHYG456;
3. A Century Arms, Micro Draco, pistol, bearing serial number 23PMD-43172; and

4. A Glock, model 23, pistol, bearing serial number FNN495;

to another person, in and affecting interstate and foreign commerce, knowing or having reasonable cause to believe that the use, carrying, and possession of a firearm by the recipient would constitute a felony (as defined in section 932(a)), all in violation of Title 18, United States Code, Sections 933(a)(1) and (b).

### **COUNT 3**

Beginning on an unknown date, but as early as April 28, 2023, and continuing through February 1, 2024, said dates being approximate, in Greene County, in the Western District of Missouri, and elsewhere, the defendant, **DAKOTA RAY MITCHELL**, did receive from another person, in or otherwise affecting interstate or foreign commerce, one or more firearms, including, but not limited to the following:

1. A Glock, model 21 Gen5, pistol, bearing serial number CATV555;
2. A Glock, model 43X, pistol, bearing serial number AHYG456;
3. A Century Arms, Micro Draco, pistol, bearing serial number 23PMD-43172; and
4. A Glock, model 23, pistol, bearing serial number FNN495;

knowing or having reasonable cause to believe that such receipt would constitute a felony (as defined in section 932(a)), all in violation of Title 18, United States Code, Sections 933(a)(2) and (b).

### **COUNT 4**

On or about September 21, 2023, within Greene County, in the Western District of Missouri, the defendant, **ALEEYAH R. FOLSOM**, in connection with the attempted acquisition of a firearm, Glock, model 21 Gen5, bearing serial number CATV555, from a licensed dealer of firearms within the meaning of Chapter 44, Title 18, United States Code, knowingly made a false and fictitious written statement, to a licensed dealer of firearms, which statement was intended and likely to deceive a licensed dealer of firearms, as to a fact material to the lawfulness of such acquisition of the said firearm to the defendant under chapter 44 of Title 18, in that the defendant did execute a Department of Justice,

Bureau of Alcohol, Tobacco, Firearms, and Explosives form 4473, Firearms Transaction Record, to the effect that that she was the actual buyer of the firearm indicated on the Form 4473, when in fact as the defendant then knew, she was not the actual buyer of the firearm, all in violation of Title 18, United States Code, Sections 922(a)(6) and 924(a)(2).

**COUNT 5**

On or about October 8, 2023, within Greene County, in the Western District of Missouri, the defendant, **ALEEYAH R. FOLSOM**, in connection with the attempted acquisition of a firearm, Glock, model 43X, pistol, bearing serial number AHYG456, from a licensed dealer of firearms within the meaning of Chapter 44, Title 18, United States Code, knowingly made a false and fictitious written statement, to a licensed dealer of firearms, which statement was intended and likely to deceive a licensed dealer of firearms, as to a fact material to the lawfulness of such acquisition of the said firearm to the defendant under chapter 44 of Title 18, in that the defendant did execute a Department of Justice, Bureau of Alcohol, Tobacco, Firearms, and Explosives form 4473, Firearms Transaction Record, to the effect that that she was the actual buyer of the firearm indicated on the Form 4473, when in fact as the defendant then knew, she was not the actual buyer of the firearm, all in violation of Title 18, United States Code, Sections 922(a)(6) and 924(a)(2).

**COUNT 6**

On or about October 20, 2023, within Webster County, in the Western District of Missouri, the defendant, **ALEEYAH R. FOLSOM**, in connection with the attempted acquisition of a firearm, a Century Arms, Micro Draco, pistol, bearing serial number 23PMD-43172, from a licensed dealer of firearms within the meaning of Chapter 44, Title 18, United States Code, knowingly made a false and fictitious written statement, to a licensed dealer of firearms, which statement was intended and likely to deceive a licensed dealer of firearms, as to a fact material to the lawfulness of such acquisition of the said firearm to the defendant under chapter 44 of Title 18, in that the defendant did execute a Department of Justice, Bureau of Alcohol, Tobacco, Firearms, and Explosives form 4473, Firearms

Transaction Record, to the effect that that she was the actual buyer of the firearm indicated on the Form 4473, when in fact as the defendant then knew, she was not the actual buyer of the firearm, all in violation of Title 18, United States Code, Sections 922(a)(6) and 924(a)(2).

**COUNT 7**

On or about December 22, 2023, within Christian County, in the Western District of Missouri, the defendant, **ALEEYAH R. FOLSOM**, in connection with the attempted acquisition of a firearm, a Glock, model 23, pistol, bearing serial number FNN495, from a licensed dealer of firearms within the meaning of Chapter 44, Title 18, United States Code, knowingly made a false and fictitious written statement, to a licensed dealer of firearms, which statement was intended and likely to deceive a licensed dealer of firearms, as to a fact material to the lawfulness of such acquisition of the said firearm to the defendant under chapter 44 of Title 18, in that the defendant did execute a Department of Justice, Bureau of Alcohol, Tobacco, Firearms, and Explosives form 4473, Firearms Transaction Record, to the effect that that she was the actual buyer of the firearm indicated on the Form 4473, when in fact as the defendant then knew, she was not the actual buyer of the firearm, all in violation of Title 18, United States Code, Sections 922(a)(6) and 924(a)(2).

**COUNT 8**

Beginning on an unknown date, but as early as April 28, 2023, and continuing through July 9, 2024, said dates being approximate, in Greene County, in the Western District of Missouri, and elsewhere, the defendant, **DAKOTA RAY MITCHELL** knowing that he was an unlawful user of a controlled substance as defined in 21 U.S.C. § 802, knowingly possessed one or more firearms, including, but not limited to the following:

1. A Glock, model 22, pistol, bearing serial number FCM930US;
2. A Glock, model 17, pistol, bearing serial number BGFA887;
3. A Glock, model 21 Gen5, pistol, bearing serial number CATV555;
4. A Glock, model 43X, pistol, bearing serial number AHYG456;

5. A Century Arms, Micro Draco, pistol, bearing serial number 23PMD-43172;
6. A Glock, model 23, pistol, bearing serial number FNN495; and
7. A Glock 27, pistol, bearing serial number BCEP258;

which had been transported in interstate commerce, all in violation of Title 18, United States Code, Sections 922(g)(3) and 924(a)(8).

**A TRUE BILL.**

*/s/ Stephanie Wan*

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**STEPHANIE L. WAN**  
Assistant United States Attorney  
Missouri Bar #58918  
Dated: 10/01/2024  
Springfield, Missouri

*/s/ Pamela Foster*

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**FOREPERSON OF THE GRAND JURY**